

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Criminal No.: 05-30030-MAP

UNITED STATES OF AMERICA,

v.

CHARLES A. HOWARD

**MOTION OF THE DEFENDANT, CHARLES A. HOWARD,  
TO MODIFY CONDITIONS OF RELEASE**

Charles A. Howard, a defendant in the above-referenced, hereby moves to modify the conditions of his pretrial release entered on June 15, 2005, so as to change his residential address from 14 Fisher Street, Springfield, Massachusetts, to 151 Laconia Street Springfield, Massachusetts. As grounds for this motion, the defendant states by his undersigned counsel as follows.

1. At the time of his arrest in this matter, the defendant, his wife and three children (ages then of 13 years, 8 years and 19 months) all resided with his wife's brother at 6 Waverly Street, Ludlow, Massachusetts. Due to his arrest, and to the corresponding issues raised, the brother of the defendant's wife and the defendant decided that the defendant should no longer reside at 6 Waverly Street, Ludlow, Massachusetts.

2. Consequently, and as a condition of his pretrial release, the defendant was ordered to reside with his mother, Donna Kijak, at her home at 14 Fisher Street, Springfield, Massachusetts, 01109.

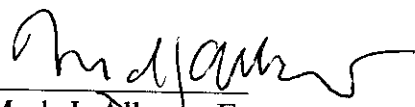
3. To maintain the continuity of the defendant's family, the defendant, his wife and three children have recently rented the residential premises at 151 Laconia Street Springfield, Massachusetts, all so that they could live together as a family at those premises.

4. The defendant has complied with all conditions of his pretrial release entered on June 15, 2005.

For these reasons, the defendant, Charles A. Howard, respectfully requests that the court modify the conditions of his pretrial release entered on June 15, 2005, so as to change his residential address from 14 Fisher Street, Springfield, Massachusetts, to 151 Laconia Street Springfield, Massachusetts, 01129-1110; to change his residential telephone number from (413) 732-0473 to (413) 543-1413; and to relieve him of the requirement of living with his mother.

Dated: January 4, 2006

THE DEFENDANT,  
CHARLES A. HOWARD,

By:   
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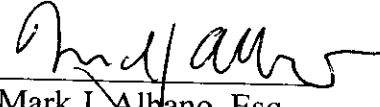
### **CERTIFICATE OF SERVICE**

I, Mark J. Albano, Esq., hereby certify that a copy of the foregoing document was served upon the following persons, via first class mail, on this the 4<sup>th</sup> day of January, 2006:

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